

EXHIBIT 114

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EIG ENERGY FUND XIV, L.P.,
EIG ENERGY FUND XIV-A, L.P.,
EIG ENERGY FUND XIV-B, L.P.,
EIG ENERGY FUND XIV (CAYMAN), L.P.,
EIG ENERGY FUND XV, L.P.,
EIG ENERGY FUND XV-A, L.P.,
EIG ENERGY FUND XV-B, L.P., AND
EIG ENERGY FUND XV (CAYMAN), L.P.,

Plaintiffs,

-against-

KEPPEL OFFSHORE & MARINE LTD.,

Defendant.

Case No. 18-cv-01047 (PGG)

DEFENDANT'S FIRST AMENDED RESPONSES
TO PLAINTIFFS' FIRST SET OF INTERROGATORIES

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure (“Federal Rules”), the Local Rules of the United States District Court for the Southern District of New York (“Local Rules”), and any other applicable laws or rules, Defendant Keppel Offshore & Marine Ltd. (“Keppel” or “Defendant”) hereby supplements and amends its responses and objections to the First Set of Interrogatories (including all definitions, instructions and interrogatories therein, “Interrogatories”) served by EIG Energy Fund XIV, L.P., EIG Energy Fund XIV-A, L.P., EIG Energy Fund XIV-B, L.P., EIG Energy Fund XIV (Cayman), L.P., EIG

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Energy Fund XV, L.P., EIG Energy Fund XV-A, L.P., EIG Energy Fund XV-B, L.P. and EIG Energy Fund XV (Cayman), L.P. (collectively, “Plaintiffs”) on August 11, 2020.¹

Keppel incorporates by reference its prior responses and objections served on September 10, 2020, and supplements and amends its responses as follows:

SPECIFIC RESPONSES AND OBJECTIONS

INTERROGATORY 1.a.

Identify the individuals and entities referenced in the Statement of Facts, including: Individuals referenced in paragraphs 7 to 17, including “Consultant,” “KOM Executive 1,” “KOM Executive 2,” “KOM Executive 3,” “KOM Executive 4,” “KOM Executive 5,” “KOM Executive 6,” “KOM Sub Executive,” “Brazilian Official 1,” “Brazilian Official 2,” and “Party Official”.

RESPONSE TO INTERROGATORY 1.a.

Keppel asserts and incorporates by reference the General and Specific Objections to Interrogatory 1.a. set forth in its September 10, 2020 responses and objections. Subject to and without waiving its objections, Keppel states that, in the Statement of Facts of the DPA, Consultant refers to Zwi Skornicki; KOM Executive 1 refers to Tong Chong Heong; KOM Executive 3 refers to Chow Yew Yuen; KOM Executive 5 refers to Tommy Sam; KOM Executive 6 refers to Jeffrey Chow; Brazilian Official 1 refers to Pedro Barusco; and Brazilian Official 2 refers to Renato Duque.

¹ Nothing herein is intended, nor shall it be interpreted, to contradict the acceptance of responsibility by Keppel set forth in the Deferred Prosecution Agreement (“DPA”) that Keppel entered into with the U.S. Department of Justice, dated December 22, 2017, or the facts described in the Statement of Facts of the DPA.

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INTERROGATORY 1.b.

Identify the individuals and entities referenced in the Statement of Facts, including: Individuals and entities referenced in paragraphs 70 to 78, including the “KOM subsidiary,” “KOM executives,” “secretary,” and “Consultant’s company”; and “Workers’ Party official.”

RESPONSE TO INTERROGATORY 1.b.

Keppel asserts and incorporates by reference the General and Specific Objections to Interrogatory 1.b. set forth in its September 10, 2020 responses and objections. Subject to and without waiving its objections, Keppel states that, in paragraph 72 of the Statement of Facts of the DPA, “KOM executives” refers to Tong Chong Heong and Chow Yew Yuen; and “executive of a KOM subsidiary in Brazil” refers to Kwok Kai Choong.

INTERROGATORY 3

Identify every person subject to the “remedial measures” referenced on page 4, subsection d. of the DPA.

RESPONSE TO INTERROGATORY 3

Keppel asserts and incorporates by reference the General and Specific Objections to Interrogatory 1.b. set forth in its September 10, 2020 responses and objections. Subject to and without waiving its objections, Keppel identifies the following individuals involved in Sete who were among the seven employees “caused to separate from the Company”, as described in paragraph 4.d. of the DPA: Jeffrey Chow, Tommy Sam and Chow Yew Yuen.

Dated: July 30, 2021

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CRAVATH, SWAINE & MOORE LLP,

By:

/s/ Peter T. Barbur

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